

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WEEKS MARINE, INC., individually and on behalf of a  
class of all those similarly situated,

Plaintiff,

v.

BRIDGESTONE CORPORATION, BRIDGESTONE  
INDUSTRIAL PRODUCTS AMERICA, INC.,  
TRELLEBORG INDUSTRIE S.A., DUNLOP OIL &  
MARINE LTD., PARKER ITR SRL, MANULI OIL &  
MARINE (U.S.A.) INC., YOKOHAMA RUBBER CO.,  
LTD., PW CONSULTING (OIL AND MARINE) LTD.,  
PETER WHITTLE, DAVID BRAMMAR, BRYAN  
ALLISON, JACQUES COGNARD, CHRISTIAN  
CALECA, MISAO HIOKI, FRANCESCO SCAGLIA,  
and VANNI SCODEGGIO,

Defendants.

No. 1:07-cv-06811 (AKH)

**MOTION TO ADMIT COUNSEL *PRO HAC VICE***

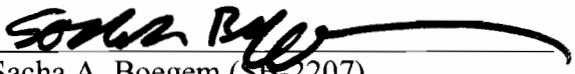
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for  
the Southern District of New York, and upon my Declaration, dated October 8, 2007, and the  
exhibits attached thereto, I, Sacha A. Boegem, a member in good standing of the bar of this  
Court, hereby move for an Order allowing the admission *pro hac vice* of:

John M. Majoras, Esq.  
Jones Day  
51 Louisiana Ave., N.W.  
Washington, D.C. 20001  
Tel. (202) 879-3939  
Fax. (202) 626-1700  
jmmajoras@jonesday.com

Mr. Majoras is a member in good standing of the bars of the state of Ohio (inactive) and the District of Columbia. There are no pending disciplinary actions against Mr. Majoras in any State or Federal court.

Dated: New York, New York  
October 9, 2007

Respectfully submitted,

By:   
Sacha A. Boegem (SB-2207)  
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*Counsel for Defendant Parker ITR Srl*

**CERTIFICATE OF SERVICE**


I hereby certify that on October 9, 2007, a true and correct copy of the foregoing

MOTION TO ADMIT COUNSEL *PRO HAC VICE* was sent via regular mail to:

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Sacha A. Boegem

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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WEEKS MARINE, INC., individually and on behalf of a :  
class of all those similarly situated, :  
:  
Plaintiff, :  
:  
v. : No. 1:07-cv-06811 (AKH)  
:  
BRIDGESTONE CORPORATION, BRIDGESTONE :  
INDUSTRIAL PRODUCTS AMERICA, INC., :  
TRELLEBORG INDUSTRIE S.A., DUNLOP OIL & :  
MARINE LTD., PARKER ITR SRL, MANULI OIL & :  
MARINE (U.S.A.) INC., YOKOHAMA RUBBER CO., :  
LTD., PW CONSULTING (OIL AND MARINE) LTD., :  
PETER WHITTLE, DAVID BRAMMAR, BRYAN :  
ALLISON, JACQUES COGNARD, CHRISTIAN :  
CALECA, MISAO HIOKI, FRANCESCO SCAGLIA, :  
and VANNI SCODEGGIO, :  
Defendants.

----- X

**DECLARATION OF SACHA A. BOEGEM IN SUPPORT OF  
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, SACHA A. BOEGEM, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an Associate with Jones Day, 222 East 41<sup>st</sup> Street, New York, New York, 10017, counsel for defendant Parker ITR Srl in the above-captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant's motion to admit John M. Majoras as counsel *pro hac vice* to represent defendant Parker ITR Srl in this matter.
2. I am a member in good standing of the bars of the states of New York, Connecticut, Florida, and the District of Columbia, and was first admitted to practice law October 31, 2005. I am also admitted to the bar of the United States District Courts for the Southern, Northern, Eastern and Western District of New York, and am in good standing with these Courts.

3. Mr. Majoras is an Associate with Jones Day in Washington, D.C., and is professionally associated with me in this matter.
4. Mr. Majoras is admitted to practice in the State of Oregon and in the District of Columbia, and is admitted to the bar of the United States District Court for the District of Columbia and U.S. Court of Appeals, D.C. Circuit.
5. Mr. Majoras is in good standing with the bars of State of Oregon and the District of Columbia, and has not been disciplined in any jurisdiction. (*See Exhibit A*).
6. Mr. Majoras is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
7. Mr. Majoras agrees to comply with all laws, rules, and regulations of the State of New York and the United States District Court for the Southern District of New York.
8. Accordingly, I am pleased to move the admission of Mr. Majoras, *pro hac vice*.
9. I respectfully submit a proposed order granting the admission of Mr. Majoras, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit John M. Majoras, *pro hac vice*, to represent defendant Parker ITR Srl in the above-captioned matter, be granted.

Dated: New York, New York  
October 8, 2007

Respectfully submitted,

  
SACHA A. BOEGEN (SB-2207)



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

CARMEN GUERRICAGOITIA MCLEAN

---

was on the 8<sup>TH</sup> day of APRIL, 2002

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duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on October  
4, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

# Oregon State Bar

## CERTIFICATE

State of Oregon                    )  
  ) ss.  
County of Clackamas            )

I, Linn D. Davis, do hereby certify that I am an Assistant Disciplinary Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

**CARMEN G. MCLEAN**

was admitted to practice law in the State of Oregon by examination and became an active member of the Oregon State Bar on October 24, 2001.

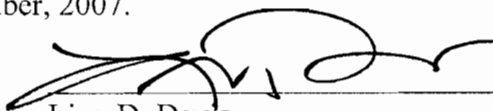
There are no complaints, grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

Ms. McLean is an active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 24<sup>th</sup> day of September, 2007.



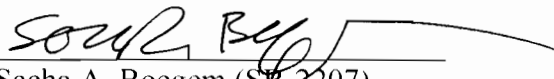
  
Linn D. Davis  
Assistant Disciplinary Counsel  
Oregon State Bar

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2007, true and correct copies of the foregoing (1) Motion to Admit Counsel Pro Hac Vice and (2) Declaration of Sacha A. Boegem in Support of Motion to Admit Counsel Pro Hac Vice and attached exhibits are being served this day on all counsel of record or pro se parties identified on the attached Service List by overnight mail.

Dated: October 10, 2007  
New York, New York

Respectfully submitted,

  
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